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**IN THE COURT OF COMMON PLEAS  
SUMMIT COUNTY, OHIO**

**MID-AMERICAN SECURITY  
SERVICE, INC.  
2641 S. Arlington Road  
Akron, Ohio 44319**

**Plaintiff,**

**v.**

**NATIONAL ENQUIRER, INC.  
5401 N.W. Broken Sound Blvd.  
Boca Raton, Florida 33487**

**Defendant.**

**CASE: CV 2001-09-4692**

**JUDGE: ASSIGNED TO JUDGE COSGROVE**

**PLAINTIFF'S COMPLAINT FOR  
DEFAMATION, FALSE LIGHT, AND  
INJURIOUS FALSEHOOD**

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Now comes Plaintiff, Mid-American Security Service, Inc. (Plaintiff), by and through its undersigned counsel, and does hereby submit Plaintiff's Complaint against National Enquirer, Inc. (Defendant), and states as follows:

**COUNT ONE**

**DEFAMATION**

1. Plaintiff is a validly existing Ohio corporation in good standing with the State of Ohio, whose principal address is 2641 S. Arlington Road, Akron, Ohio 44319.

2. Plaintiff provides flagging services and unarmed and armed security guard services to businesses, government and institutional customers throughout the Northeastern Ohio region.
3. Defendant is a validly existing Florida corporation in good standing whose principal address is 5401 N.W. Broken Sound Blvd., Boca Raton, FL 33487.
4. Defendant publishes a weekly tabloid newspaper, *The National Enquirer*, and markets it throughout the United States, including Summit County, Ohio.
5. In the September 11, 2001 edition of *The National Enquirer*, the Defendant published an article, which read and viewed in its entirety, represented that Plaintiff fired one Tony Longcoy ("Longcoy") from his position as a security guard.
6. Specifically, Defendant published on page 10 of the mentioned tabloid and in the headline of the lead article appearing on that page that the Longcoy lost his job for "bagging a bank robber." The photograph that accompanies the headline, viewed together with the written article, represents that Plaintiff was the employer of Longcoy at the time he guarded the bank and arrested the bank robber. Defendant further stated in the article that "Longcoy is still without a steady job." This collective statement, including Defendant's words and picture, is a false representation that Plaintiff fired Longcoy and is defamatory.
7. The Defendant's defamatory statement that Plaintiff fired Longcoy was published without privilege.

8. The Defendant was negligent and wantonly reckless, and acted with utter and reckless disregard for the truth in making the defamatory statement that Plaintiff fired Longcoy.
9. The Defendant's defamatory statement that Plaintiff fired Longcoy is defamatory per se, and disparages the business reputation of the Defendant.
10. Plaintiff has been damaged and continues to be damaged by the Defendant's defamatory statement.
11. Plaintiff, Mid-American Security Services, Inc. is entitled to consequential, compensatory and punitive damages in an amount greater than Twenty-Five Thousand Dollars (\$25,000.00).

**COUNT TWO**

**FALSE LIGHT**

12. The Plaintiff re-alleges the allegations contained in the above paragraphs as if fully restated herein.
13. Because the words and the picture published by Defendant as described in paragraphs 5 and 6 conveyed the false and defamatory idea that Plaintiff fired Longcoy from his job after Longcoy heroically arrested a bank robber, Defendant has placed Plaintiff in a false light.
14. Plaintiff has been damaged and continues to be damaged by the Defendant's placing of Plaintiff in a false light.
15. Plaintiff, Mid-American Security Services, Inc. is entitled to consequential, compensatory and punitive damages in an amount greater than Twenty-Five Thousand Dollars (\$25,000.00).

**COUNT THREE**

**INJURIOUS FALSEHOOD**

16. The Plaintiff re-alleges the allegations contained in the above paragraphs as if fully restated herein.

17. Because Defendant's false statement as described in paragraphs 5 and 6 has done and continues to do harm to the pecuniary interests of Plaintiff and has caused and continues to cause pecuniary loss to Plaintiff, Plaintiff has been damaged and continues to be damaged.

18. Plaintiff, Mid-American Security Services, Inc. is entitled to consequential, compensatory and punitive damages in an amount greater than Twenty-Five Thousand Dollars (\$25,000.00).

**WHEREFORE**, Mid-American Security Service, Inc. demands and prays for judgment as follows:

- A. **In re: Count One:** Judgment against Defendant, National Enquirer, Inc., in an amount in excess of Twenty-Five Thousand Dollars (\$25,000.00) and to be determined at the trial of this matter.
- B. **In re: Count Two:** Judgment against Defendant, National Enquirer, Inc. in an amount in excess of Twenty-Five Thousand Dollars (\$25,000.00) and to be determined at the trial of this matter.
- C. **In re: Count Three:** Judgment against Defendant, National Enquirer, Inc. in an amount in excess of Twenty-Five Thousand Dollars (\$25,000.00) and to be determined at the trial of this matter.

D. In re: All Counts: Punitive damages in the amount of Five Hundred Thousand Dollars (\$500,000.00), attorney fees, costs, interest at the maximum legal rate and such other relief as this Court deems just and proper.

Respectfully submitted,

  
Jeffrey T. Witschey, Esq., #0059151  
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**ATTORNEYS FOR MID-AMERICAN  
SECURITY SERVICE, INC.**

**Certificate of Service**

I hereby certify that a copy of the foregoing was served upon CT Corporation System, 1200 S. Pine Island Road, Plantation, Florida 33324 this 28th day of September, 2001 by regular U.S. mail.

  
Jeffrey T. Witschey

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LJS